## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT MANAGEMENT BOARD FOR PUERTO RICO

PROMESA TITLE III

NO. 17 BKT 3283-LTS

as representative of

THE COMMONWEALTH OF PUERTO RICO, ET ALS.

**DEBTORS** 

In re:

THE FINANCIAL OVERSIGHT MANAGEMENT BOARD FOR PUERTO RICO

PROMESA TITLE III

as representative of

PUERTO RICO HIGHWAY AND TRANSPORTATION AUTHORITY.

**DEBTORS** 

NO. 17 BKT 3567-LTS

URGENT MOTION TO BE HEARD AT AUGUST 9<sup>TH</sup>, 2017 HEARING FOR REPLY TO OBJECTION OF THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO MOTION FOR RELIEF FROM AUTOMATIC STAY

TO THE HONORABLE DISTRICT COURT JUDGE LAURA TAYLOR SWAIN:

**COMES NOW, South Parcel of Puerto Rico, S.E.**, (hereinafter referred as "South Parcel"), through the undersigned attorney and very respectfully states, alleges and prays as follows:

1. On July 23<sup>rd</sup>, 2017, South Parcel filed its Reply to Puerto Rico Highway and Transportation Authority's (hereinafter referred as "PRHTA") Objection to South Parcel's

Motion for Relief from Automatic Stay (See Docket 208 of Case No. 17-03567).

2. Pursuant to the Court Order issued on July 3<sup>rd</sup>, 2017 (See Docket 182 of Case No. 17-03567 or Docket 570 of Case No. 17-03283), which informs the parties that they can request a hearing on this matter, South Parcel requested to this Honorable Court an expedited hearing in order to discuss the issues contained in South Parcel's Reply to PRHTA's Objection to the Motion for Relief of Stay. (See paragraph 3 and request for relief of Docket 208 of Case No. 17-03567).

3. South Parcel is thus submitting this Urgent Motion reiterating their request to be heard at the August  $9^{th}$ , 2017 Omnibus Hearing.

WHEREFORE, South Parcel respectfully requests that this Honorable Court (1) take NOTE of the foregoing, (2) issue an ORDER to set an Argumentative Hearing on August 9<sup>th</sup>, 2017, and (3) GRANT any other further relief that may be deemed just and proper.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

**RESPECTFULLY SUBMITTED**: In San Juan, Puerto Rico on this 25<sup>th</sup> day of July, 2017.

## **S/VICTOR M. RIVERA-RIOS**

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